INDEPENDENCE COUNTY, ARKANSAS CIRCUIT CLERK GREG WALLIS FILED FOR RECORD BY CARMEN DUNCAN D.C.

DATE: DECEMBER 27, 2019

TIME: 08:02:27

## IN THE CIRCUIT COURT OF INDEPENDENCE COUNTY, ARKANSAS

LUNDEN ALEXIS ROBERTS

**PLAINTIFF** 

VS.

ROBERT HUNTER BIDEN

DEFENDANT

Case No: 32DR-19-187

I 2D DIV I

## **MOTION TO INTERVENE**

COMES NOW D&A Investigations, Inc., (INTERVENER) and serves its Motion as provided for in Rule 5, Ark. R. Civ. P.24. Procedural Rules and in support thereof states:

18 U.S.C. Section §4 requires one having knowledge of the commission of a felony to make known to a Judge or other person in civil or military authority under the U.S.

1. On 19 December 2019: the INTERVENER provided PLAINTIFF'S attorney with electronic access to DEFENDANT's bank account records subject of known felonies including Fraud and Counterfeiting. Federal and State Statutes prohibit the filing and/or recording of such records.

INTERVENER herein provides PLAINTIFF'S attorney with consent for lawful use of these bank account records, and/or as ordered by this Honorable Court.

2. On 23 December 2019: INTERVENER provided this Honorable Court with information related to DEFENDANT's active concealment of bank account records in a Pleading of which the original is provided on this date.

Refer to USPS No. 840-5327-0036-002-00021-40181-02.

3. These bank account records bear Exhibit identifier(s) known by DEFENDANT as the subject of criminal investigation(s) both adjudicated and ongoing, of which he is a party to.

Refer to the INTERVENER's: 23 December 2019 Pleading: 7 through 12.

- 4. The bank account records provide the source and destination bank account numbers of: Burisma Holdings Limited, PrivatBank, Bank of China, DEFENDANT's business partners, Rosemont Seneca Echai, LLC. a/k/a RSB, LLC. a/k/a RS Bais, LLC.
- 5. They also verify the Counterfeiting scheme accumulating \$156,073,944.24 with an *Average Account Value* (monthly balance) in the amount of: \$6,785,823.66.



6. Burisma Holdings Limited, finances Atlantic Council (Ukraine) and associated rogue operatives from the USDOS, FVEY and CrowdStrike in Ukraine, using PrivatBank.

December 2016 into January 2017. After the theft of \$5.4 +/- billion in foreign aid, the International Monetary Fund (IMF) froze foreign aid to Ukraine and suspended PrivatBank's international transactions.

7. On 11 September 2019. The IMF released the freeze to allow foreign aid after the Ukraine Court issued Search and Seizure Warrants to be executed on PrivatBank.

WHERFORE the Intervener moves this Honorable Court to consider this Motion to Intervene relative to DEFENDANT's concealment of bank account records referred to in 4 above. The investigation is ongoing, Privilege Applies, Sources and Methods are Protected.

Respectfully submitted, **D&A Investigations, Inc.**INTERVENER.

P.O. Box 917394

Longwood, Florida 32791-7394

T. (407) 448-4565

E. dominic@dgator.com

By: Dominic Casey

Investigator

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been provided on the <u>27</u> <u>December 2019</u> to the following person or persons by the following method:

E-mail Facsimile Hand delivery First Class Mail Express Mail

Clint W. Lancaster: clint@thelancasterlawfirm.com

Brent Langdon: blangdon@ldatty.com

END OF DOCUMENT

ORIGINAL D&A Investigations, Inc.

Page 2 of 2